



California Fair Political Practices Commission

February 11, 1987

Bob Steele, Assistant Chief
Political Reform Division
Secretary of State
1230 "J" Street
Post Office Box 1467
Sacramento, CA 95807

Re: Your Request for Advice,
Our File No. I-87-016

Dear Mr. Steele:

You have forwarded a copy of a letter received by you from Dennis A. Sondker, Treasurer of the California Federal Political Action Committee. You have requested of Mr. Sondker that the committee amend its statement of organization to include the full name of the sponsor, California Federal Savings and Loan Association. Mr. Sondker has responded by urging that "California Federal" is an appropriate name for the sponsor to utilize. You have asked for our interpretation of the relevant law.

QUESTION

May California Federal Savings and Loan Association sponsor a committee which utilizes the name "California Federal Political Action Committee"?

CONCLUSION

California Federal Savings and Loan Association must include its full name in the name of any political action committee which it sponsors and may not use the name "California Federal Political Action Committee."

FACTS

California Federal Savings and Loan Association sponsors a political action committee which has filed an amended statement of organization reporting that it is a sponsored committee. (See attachments to this letter.) California Federal Savings and Loan Association utilizes the abbreviated name "California Federal" on its public displays, such as billboards, branch signs, print, radio and television advertisements, stationery and form documents such as loan applications and deposit and withdrawal tickets.

ANALYSIS

The Political Reform Act (the "Act")^{1/} requires that committees, as defined, must file statements of organization. (See generally, Sections 82013, 82048.5, 84101, 84102 and 84103.) The law was recently amended to tighten up the requirements for the name of sponsored committees. (Sections 82013, 82048.5.) Previous to these amendments, many sponsored committees utilized names for the committee which did not apprise the public of the identity of the sponsor of the committee. The typical example is that of the "Good Government Political Action Committee."

As amended, Section 84102 reads as follows:

The statement of organization required by Section 84101 shall include:

(a) The name, street address and telephone number, if any, of the committee. In the case of a sponsored committee, the name of the committee shall include the name of its sponsor. Whenever a committee has more than one sponsor, and the sponsors are members of an industry or other identifiable group, a term identifying that industry or group shall be included in the name of the committee.

(b) In the case of a sponsored committee, the name, street address and telephone number of each sponsor.

* * *

(g) Such other information as shall be required by the rules or regulations of the Commission consistent with the purposes and provisions of this chapter.

As amended in 1986, Section 84106 provides:

(a) Whenever identification of a sponsored committee is required by this title, the identification shall include the full name of the committee as contained in its statement of organization.

^{1/} Government Code Sections 81000-91015. All statutory references are to the Government Code unless otherwise noted. Commission regulations appear at 2 California Administrative Code Section 18000, et seq. All references to regulations are to Title 2, Division 6 of the California Administrative Code.

(b) A sponsored committee shall use only one name in its statement of organization.

In response to these amendments, the Commission amended Regulation 18419. As amended, the relevant portion of that regulation provides:

(b) In the case of a sponsored committee:

(1) The committee shall include the name of its sponsor in the name of the committee. If the sponsored committee has more than one sponsor and the sponsors are members of an industry or other identifiable group, the name of the committee shall include a term identifying that industry or group.

(2) The committee shall indicate on the committee's statement of organization the industry group or affiliation of the sponsor....

As can be seen from the foregoing, the name of the sponsor must appear in the name of the committee. The amended statement of organization filed by California Federal Political Action Committee reflects the name of the sponsor as "California Federal Savings and Loan Association." Therefore, under the letter of the law, that name must appear in the name of the committee which it sponsors. This is not currently the case. Consequently, your request for an amendment to that effect was appropriate.

The purpose of the recent amendments to the law was to obtain clarity. The term "California Federal Political Action Committee" is confusing because it can be read to mean that California or a group of Californians is sponsoring a political action committee for federal elections. This confusion is eliminated if the full name of the sponsor is included.

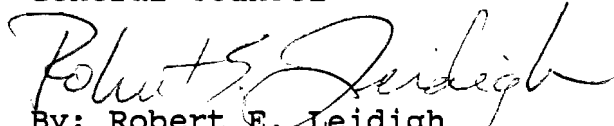
While it may be true that "California Federal" is regularly used by the Association in other contexts, without causing confusion, such is not the case in this context. The fact that the Association is officially known as California Federal Savings and Loan Association and lists itself that way as the committee's sponsor leads us to conclude that, in this context, that is the name which should appear in the name of its sponsored committee. The advertising logo which a company chooses for marketing its product does not alter its legal name and the logo should not be used where it would circumvent the provisions of the Act.

Bob Steele, Assistant Chief
February 11, 1987
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Therefore, we conclude that you are correct to require the California Federal Political Action Committee to amend its statement of organization to change the committee name. If you have any questions, you may reach me at (916) 322-5901.

Sincerely,

Diane M. Griffiths
General Counsel


By: Robert E. Leidigh
Counsel, Legal Division

DMG:REL:km



5670 Wilshire Boulevard
Los Angeles, California 90036
Telephone 213 932-XXXX 2904

RECEIVED
AND FILED
in the office of the Secretary of State
of the State of California

December 17, 1986

DEC 23 1986

MARCH FONG EU, Secretary of State

Mr. Bob Steele, Assistant Chief
Political Reform Division
Secretary of State
1230 "J" Street
Post Office Box 1467
Sacramento, California 95807

Re: California Federal Political Action Committee
I.D. #761216

Dear Mr. Steele:

I am in receipt of your letter dated December 3, 1986 requesting that the California Federal Political Action Committee (the "Committee") amend its full name to include the name of its sponsor, California Federal Savings and Loan Association (the "Association"). As Chairman and Treasurer of the Committee and as an attorney for the Association, I respectfully submit that the abbreviation of the sponsor's name used in the name of the Committee is a publicly recognized abbreviation and request that the Committee not be required to amend its name.

When the campaign disclosure provisions of the Political Reform Act were amended last year, we reviewed the amendments to determine whether a change in name might be necessary. It was our conclusion then, and it remains so now, that California Federal is a publicly recognized abbreviation for California Federal Savings and Loan Association. All of the Association's public displays, whether in the form of billboards, branch signs, print, radio or television advertisements, stationery and form documents such as loan applications and deposit and withdrawal tickets are in the name of California Federal. To the best of my knowledge there is no other entity in the state of California with the name of California Federal.

I am available to further discuss this with you or one of your associates. Your reconsideration of this matter is appreciated.

Very truly yours,

A handwritten signature in cursive script, appearing to read 'Dennis A. Sondker'.

Dennis A. Sondker
Attorney

DAS:jp



FILE AN ORIGINAL AND ONE COPY OF THIS FORM WITH:

Secretary of State
Political Reform Division
P.O. Box 1467
Sacramento, CA 95807

AMENDMENT

**RECEIVED
AND FILED**

In the office of the Secretary of State
of the State of California

AUG 26 1986

STATEMENT OF ORGANIZATION (RECIPIENT COMMITTEE)
(Government Code Section 84101-84103)

761216

IF AMENDMENT
ENTER I.D. NUMBER

(Type or Print in Ink)

FULL NAME OF COMMITTEE:

CALIFORNIA FEDERAL POLITICAL ACTION COMMITTEE

STREET ADDRESS OF COMMITTEE: (NOT P.O. BOX)	NO. AND STREET	CITY	STATE	ZIP CODE	COUNTY:
5670 Wilshire Boulevard		Los Angeles,	CA	90036	

DATE QUALIFIED AS COMMITTEE (MO., DAY, YR.):	AREA CODE	PHONE NUMBER	A. OFFICIAL USE ONLY	B. OFFICIAL USE ONLY

I TREASURER AND OTHER PRINCIPAL OFFICERS

POSITION	NAME AND PERMANENT STREET ADDRESS	(AREA CODE)	PHONE NO.
TREASURER	Dennis A. Sondker - 7172 Hawthorn Ave., #313	213	874-6539
	Los Angeles, CA 90046	213	932-2904

Attach additional information on appropriately labeled continuation sheets.

II IS THIS A CONTROLLED COMMITTEE?

(A controlled committee is one which is controlled directly or indirectly by a candidate or a proponent of a state ballot measure or which acts jointly with a candidate, controlled committee or proponent of a state ballot measure in connection with the making of expenditures. A candidate or proponent of a state ballot measure controls a committee if he or she, his or her agent, or any other committee he or she controls, has a significant influence on the actions or decisions of the committee.)

[] YES (Complete the following and proceed to Part IV) [] NO

CANDIDATES OR STATE MEASURE PROPONENTS CONTROLLING THIS COMMITTEE; CANDIDATES, STATE MEASURE PROPONENTS OR COMMITTEES WITH WHICH THIS COMMITTEE ACTS JOINTLY.

NOTE: If this committee is controlled by more than one candidate, the name of each controlling candidate must be listed below.

NAME OF CANDIDATE, STATE MEASURE PROPONENT OR COMMITTEE	IF AFFILIATED WITH ANOTHER COMMITTEE, IDENTIFICATION NUMBER OF COMMITTEE OR TREASURER'S NAME AND PERMANENT STREET ADDRESS

Attach additional information on appropriately labeled continuation sheets.

III IS THIS A SPONSORED COMMITTEE? (Refer to definitions on the reverse side)

[X] YES (Provide name and address of sponsor) [] NO

Name of Sponsor: California Federal Savings and Loan Association

Address of Sponsor: 5670 Wilshire Boulevard, Los Angeles, California 90036

(If yes, check one of the classifications below and refer to the instructions on the reverse side for definitions and rules regarding the name of the committee.)

CLASSIFICATION OF COMMITTEE BY INDUSTRY GROUP OR AFFILIATION:

- ☐ Agriculture ☐ Education ☐ Entertainment/Recreation ☒ Finance/Insurance ☐ Health
☐ Industrial/Manufacturing ☐ Labor ☐ Legal ☐ Merchandise/Retail ☐ Oil/Gas ☐ Public Employees
☐ Real Estate ☐ Trade ☐ Transportation ☐ Utilities
☐ Other: _____

Attach additional information on appropriately labeled continuation sheets.

YOU MUST COMPLETE THE VERIFICATION ON PAGE 2

For information required to be provided to you pursuant to the Information Practices Act of 1977, see "Information Manual on Campaign Disclosure Provisions of the Political Reform Act," Part X.

CALIFORNIA FEDERAL POLITICAL ACTION COMMITTEE

IF PRIMARILY FORMED TO SUPPORT OR OPPOSE SPECIFIC CANDIDATES OR MEASURES, LIST SPECIFIC CANDIDATES AND MEASURES SUPPORTED OR OPPOSED

[illegible]

Attach additional information on appropriately labeled continuation sheets.

V COMMITTEE'S PRINCIPAL ACTIVITY IF NOT SUPPORTING OR OPPOSING SPECIFIC CANDIDATES OR MEASURES

The principal activity of the Committee is to support candidates and ballot measures at the state and local levels which support the free enterprise system in general and the interests of the financial services community in particular.

Attach additional information on appropriately labeled continuation sheets.

VI. IN THE EVENT OF TERMINATION, WHAT DISPOSITION WILL BE MADE OF SURPLUS FUNDS?

VERIFICATION

I have used all reasonable diligence in preparing this Statement. I have reviewed the Statement and to the best of my knowledge the information contained herein is true and complete.

I certify under penalty of perjury under the laws of the State of California that the foregoing is true and correct.

Executed on 8/21/86 at Los Angeles, CA
(Date) (City and State)

by

(Signature of Treasurer)

Dennis A. Sondker



California Fair Political Practices Commission

January 7, 1987

Dennis A. Sondker
California Federal
5670 Wilshire Boulevard
Los Angeles, CA 90036

Re: 87-016

Dear Mr. Sondker:

Your letter requesting advice under the Political Reform Act was received on January 2, 1987 by the Fair Political Practices Commission. If you have any questions about your advice request, you may contact Robert E. Leidigh, an attorney in the Legal Division, directly at (916) 322-5901.

We try to answer all advice requests promptly. Therefore, unless your request poses particularly complex legal questions, or more information is needed, you should expect a response within 21 working days. You also should be aware that your letter and our response are public records which may be disclosed to the public upon receipt of a proper request for disclosure.

Very truly yours,

Diane M. Griffiths
General Counsel

DMG:plh